UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TEXAS 75202-2733

January 28, 2013

MEMORANDUM

SUBJECT: Quarterly cap inspection at the San Jacinto River Waste Pits superfund site

FROM: Valmichael Leos, Federal On-Scene Coordinator
Emergency Readiness Team (6SF-PE)

TO: File

I. PURPOSE

This memorandum is to document the observations of the quarterly cap inspection at the San Jacinto River Waste Pits superfund site (Site) conducted on January 24, 2013. The purpose of the site visit was to inspect the completed removal work which involves a temporary armor cap being used to stabilize the release of dioxin / furan hazardous waste from releasing into the San Jacinto River.

II. BACKGROUND

The Site consists of impoundments, approximately 14 acres in size, built in the mid-1960s for the disposal of paper mill wastes and the surrounding areas containing sediments and soils potentially contaminated by the waste materials that had been disposed of in these impoundments. The impoundments are located immediately north of the I-10 bridge and on the western bank of the San Jacinto River in Harris County, Texas. A time-critical removal action was completed in July of 2011 to stabilize the pulp waste material and sediments within the impoundments to prevent the further release of dioxins, furans, and other chemicals into the environment. The removal consisted of placement of an armor rock cap over a geotextile bedding layer and an impermeable geomembrane in some areas.

In accordance with the operations, monitoring, and maintenance (OMM) plan for the Site, the respondents are required to conduct quarterly cap inspections starting January 2012 for the first two years, semi-annually from years three to five, and annually after year five. In addition to the regularly scheduled cap inspections, impromptu inspections may be conducted if a major storm event occurs at or near the site that could adversely affect the protectiveness of the removal action.

The site inspections involve visually inspecting the armor cap for areas of erosion, damage, wear and tear of any exposed geotextile fabric or LLDPE geomembrane liner, topographic surveys, manual probing to ensure the cap maintains the prescribed design thickness, and chemical analysis of surrounding pore water. In addition to land and water based inspections of the cap, visual inspections of the site security and perimeter fencing

is also conducted. The respondents are required to conduct topographic surveys of the armor cap to ensure a minimum design thickness of the armor cap. If any deficiencies are discovered during the site inspection by either the respondents or the EPA, response procedures for repair have been established in the OMM plan.

III. CONCULSIONS

On January 14, 2013 the respondents notified EPA that during their quarterly cap inspection, there were several small areas identified that needed additional armor rock. The areas needing additional rock were surveyed the week of January 14th and a plan for maintenance was submitted to the EPA for approval on January 23, 2013.

On January 24, 2013, EPA OSC Leos conducted a site visit to document observations at the San Jacinto River Waste Pits superfund site. The inspection results indicated three items that need further attention or investigation that were not addressed in the January 23, 2013 maintenance plan submitted by the respondents.

During the site visit it was noted that the Site security fencing visible and intact with the exception of one small area about 50 feet west of the southern gate (See attachment photo 1). This area of the security fencing displayed evidence of tampering where the barb wiring had been recently cut. In addition, to the fencing being cut, a well worn path leading up to the area was present with a hole at the bottom of the fencing big enough to allow an adult to crawl through underneath. Site signage placed along the fencing perimeter and signage placed along the armor cap was visible and intact.

I did happen to see from a distance a homeless man living underneath the I-10 bridge along the crevice between the bottom of the highway road and the bridge pillars along the east side of the San Jacinto river. The man was within the site boundary and it is unknown how he trespassed through the Site security fencing.

Along the northwest corner of the site, just beyond the western berm area, it was noted that two small areas about 10 foot square where geotextile fabric was visible (See attachment photo 2). I have notified the respondents both verbal and in writing on January 28, 2013 of the areas needing further investigation.

The next quarterly cap inspection is scheduled in September 2012.

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Enclosure:- Site Inspection Photos

Site Inspection Photos
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Photo 1- View of Site perimeter fencing with evidence of tampering with barb wire cut.

Photo 2- View of visible geotextile fabric along western berm in northwest corner of Site.

Photo 3- View of Site perimeter fencing East Gate, East of San Jacinto River

Photo 4- View of Site perimeter fencing Main Gate North along I-10, West of San Jacinto River

Photo 5- View of armor cap's southern berm and eastern impoundment North of I-10, West of San Jacinto River

Photo 6- View of eastern impoundment of armor cap North of I-10

Photo 7- View of central berm with both western and eastern impoundments of armor cap North of I-10

Photo 8- View of western berm and western impoundment of armor cap North of I-10

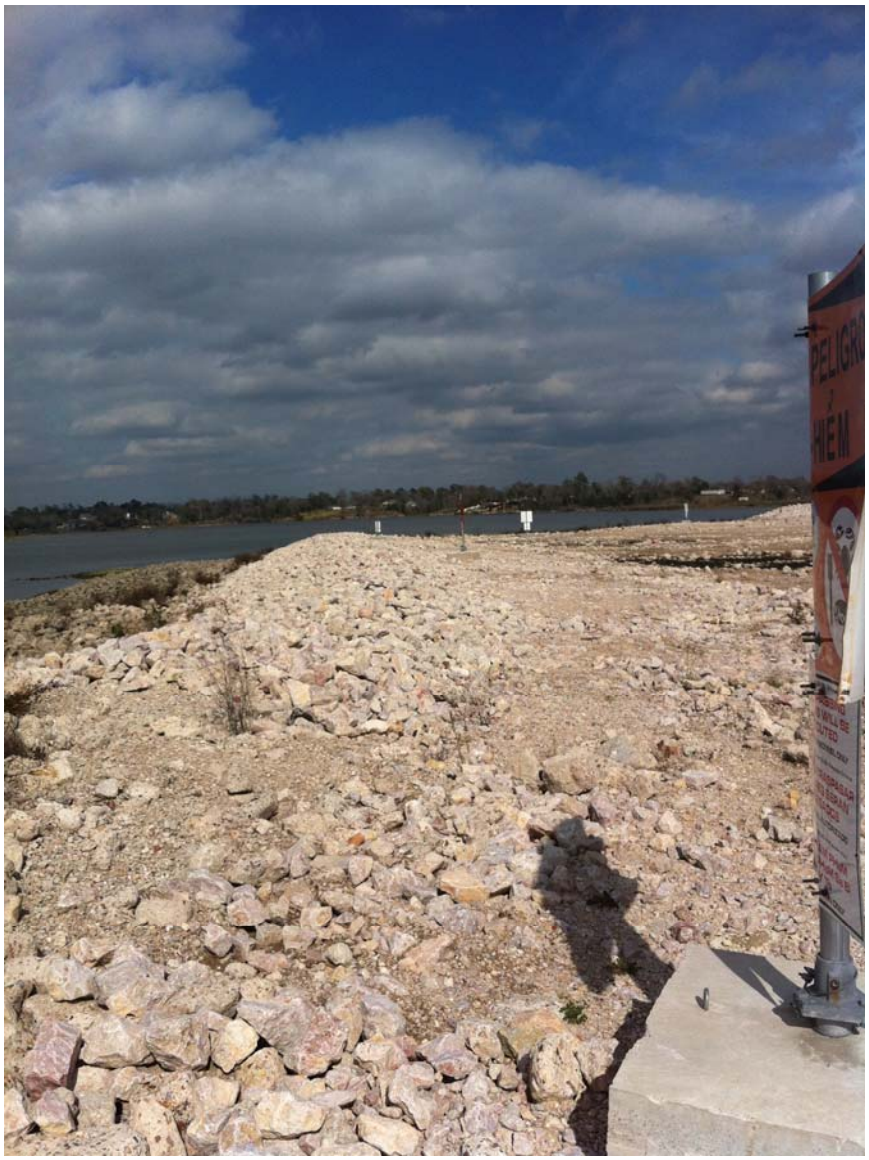

Photo 9- View of western berm and western impoundment of armor cap North of I-10